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Pa. S. Ct. No. 48558

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**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

MARCIA CARTER	:	CHAPTER 13
Debtor	:	CASE NO.: 5:15-BK-01581-JJT
	:	
CHRISTIANA TRUST, a Division of	:	
Wilmington Savings Society, FSB, as	:	
Trustee for Stanwich Mortgage Loan Trust,	:	
Series 2012-10, or its Successor or Assignee:	:	
	:	
Movant	:	
v.	:	
	:	
Marcia Carter	:	
Charles J. DeHart, III	:	
Respondents	:	

**ANSWER OF DEBTOR TO MOTION FOR RELIEF FROM
AUTOMATIC STAY OF CHRISTIANA TRUST**

The Debtor, MARCIA CARTER, by and through her counsel, David J. Harris, Esquire,
answers the Motion for Relief from Automatic Stay of Christiana Trust as follows:

1. DENIED. Strict proof thereof is demanded for trial.
2. ADMITTED.
3. DENIED. Strict proof thereof is demanded for trial.
4. DENIED. Movant's averment is a conclusion of law to which no responsive pleading is required and therefore, such averment is deemed denied..
5. ADMITTED.
6. ADMITTED.

7. ADMITTED.
8. DENIED. Strict proof thereof is demanded for trial.
9. DENIED. Strict proof thereof is demanded for trial.

WHEREFORE, Debtor respectfully requests that this Honorable Court deny the relief sought by Movant in its Motion.

AFFIRMATIVE DEFENSES

10. Debtor hereby incorporates by reference her answers in Paragraphs 1 through 9 above as if made a part hereof.

11. There is sufficient equity in the subject property.
12. Movant is adequately protected.
13. The subject property is necessary to the Debtor for an effective reorganization.
14. There is no cause for granting the relief sought by Movant in its Motion.
15. Movant does not have standing to bring the instant action.

WHEREFORE, the Debtor respectfully requests that this Honorable Court deny the relief sought by Movant in its Motion.

RESPECTFULLY SUBMITTED

Dated: November 17, 2015
Wilkes-Barre, Pennsylvania

By: /s/ David J. Harris
DAVID J. HARRIS, ESQUIRE